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6  
7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$282,500.00 IN  
U.S. CURRENCY,  
15 Defendant.

2:24-MC-00317-DJC-CKD

STIPULATION AND ORDER EXTENDING  
TIME FOR FILING A COMPLAINT FOR  
FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

17  
18 It is hereby stipulated by and between the United States of America and potential claimant Ronnie  
19 Borrego (“claimant”), by and through their respective counsel, as follows:

20 1. On or about May 15, 2024, claimant filed a claim in the administrative forfeiture  
21 proceeding with the Drug Enforcement Administration with respect to the above-referenced currency  
22 (hereafter “defendant currency”), which was seized on or about February 9, 2024.

23 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit  
24 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
25 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
26 than claimant has filed a claim to the defendant currency as required by law in the administrative  
27 forfeiture proceeding.

28 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
2 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
3 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
4 parties. That deadline was August 13, 2024.

5       4. By Stipulation and Order filed August 13, 2024, the parties stipulated to extend to October  
6 11, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

9       5. By Stipulation and Order filed October 8, 2024, the parties stipulated to extend to  
10 December 10, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
12 subject to forfeiture.

13       6. By Stipulation and Order filed December 9, 2024, the parties stipulated to extend to  
14 February 7, 2025, the time in which the United States is required to file a civil complaint for forfeiture  
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
16 subject to forfeiture.

17       7. By Stipulation and Order filed February 6, 2025, the parties stipulated to extend to March  
18 10, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the  
19 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
20 forfeiture.

21       8. By Stipulation and Order filed March 10, 2025, the parties stipulated to extend to April  
22 24, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the  
23 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
24 forfeiture.

25       9. By Stipulation and Order filed April 24, 2025, the parties stipulated to extend to June 6,  
26 2025, the time in which the United States is required to file a civil complaint for forfeiture against the  
27 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
28 forfeiture.

1       10. By Stipulation and Order filed June 2, 2025, the parties stipulated to extend to July 21,  
2 2025, the time in which the United States is required to file a civil complaint for forfeiture against the  
3 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
4 forfeiture.

5       11. By Stipulation and Order filed July 21, 2025, the parties stipulated to extend to September  
6 19, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

9       12. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
10 to October 20, 2025, the time in which the United States is required to file a civil complaint for forfeiture  
11 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
12 subject to forfeiture.

13       13. Accordingly, the parties agree that the deadline by which the United States shall be  
14 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
15 alleging that the defendant currency is subject to forfeiture shall be extended to October 20, 2025.

16 Dated: 9/19/2025

ERIC GRANT  
United States Attorney

17       By: /s/ Kevin C. Khasigian  
18 KEVIN C. KHASIGIAN  
19 Assistant U.S. Attorney

20 Dated: 9/19/2025

/s/ Isaac Safier  
ISAAC SAFIER  
Attorney for potential claimant  
Ronnie Borrego  
(Authorized by phone)

24 **IT IS SO ORDERED.**

26 Dated: September 19, 2025

/s/ Daniel J. Calabretta

27 THE HONORABLE DANIEL J. CALABRETTA  
28 UNITED STATES DISTRICT JUDGE